

1
2 David Richardson, OSB 051370
3 david@pdxlawgroup.com
PDX LAW GROUP PC
4 121 SW Morrison St., Ste. 1520
Portland, OR 97204
5 (ph) 503-546-0141
Attorneys for Plaintiff

6
7
8
9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF OREGON, PORTLAND DIVISION**

11 ANGELA TORRES, an individual,

Case no.: 3:17-CV-01270-AC

12 Plaintiff,

PLAINTIFF'S STATUS REPORT

13 v.

14 ALIREZA ZAMANIZADEH, a/k/a ALI
ZAMANI, an individual, and ADULT CARE
SEARCH, a foreign non-profit corporation,

15 Defendants.

16 As requested by Judge Acosta, Plaintiff submits this Status report:

17 Negotiations to resolve this case ended when Plaintiff's contemporaneous negotiations
18 with adverse parties claiming right to Plaintiff's Bend property – quitclaimed to defendant Adult
19 Care Search (ACS) by defendant Ali Zamani (Zamani), then mortgaged by ACS – ended and
20 those third parties resumed and completed a nonjudicial foreclosure of the Bend property.
21 Plaintiff filed a quiet title action in Deschutes County and received a temporary restraining order
22 (TRO) and is now seeking a preliminary injunction to prevent the third parties from taking
23

1 possession, encumbering, or selling the Bend property pending resolution of the quiet title action.

2 The preliminary injunction hearing is scheduled for September 26th, 2018.

3 Plaintiff would like to continue abatement of this case to allow resolution of the Bend
4 case and, if necessary add other new defendants and amendment of the complaint in this action
5 to reflect the broader set of facts and issues Plaintiff continues to discover. Defendants should
6 not be harmed by this postponement as they have represented there are minimal funds in the
7 accounts subject to the preliminary injunction in this case, and furthermore the Declaration by
8 Frank Najar of the Department of Justice makes it clear that the funds in dispute originated via
9 the Plaintiff. Defendants also should not be entitled to a speedy resolution as the cause of these
10 separate issues and because they have not responded to Plaintiff's discovery requests.

11 DATED September 24th, 2018

12 **PDX LAW GROUP PC**

13 */s David Richardson*
14 David Richardson, OSB 051370
david@pdxlawgroup.com
15 Attorneys for Plaintiff

16 *Served upon defendants by email and U.S.P.S. first class mail, on September 24th, 2018, to: Ali
Zamani, 613 SW Elderbrook Place, Portland, OR 97225.*